



**ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT (AHWMMA)**  
**Compliance Evaluation Inspection (CEI) Report**

**Author of Report**

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Environmental Scientist, Sr.  
Compliance and Enforcement, Industrial Hazardous Waste Branch  
Alabama Department of Environmental Management (ADEM)  
1400 Coliseum Boulevard  
Montgomery, AL 36110

**Facility Information**

QualaWash Holdings, LLC.  
202 Commerce Street  
Saraland, AL 36571  
EPA ID No. ALR000006130  
NAICS Code: 562998  
Website: [www.quala.us.com](http://www.quala.us.com)

**Responsible Officials**

Mr. Billy Jackson, Facility Manger  
Email: [bjackson@quala.us.com](mailto:bjackson@quala.us.com)

**Inspection Participants**

Mr. Jackson  
Mr. McMillian

**Date of Inspection**

May 14, 2015

**Applicable Regulations**

ADEM Administrative Code Division 335-14, Hazardous Waste Program Regulations

**Purpose of Inspection**

The purpose of the inspection was to determine compliance with all applicable requirements of the Hazardous Waste Program regulations.



## **Facility Description**

QualaWash Holdings, LLC, purchased the business entity, Quala Systems, Inc. from Quality Distribution, Inc. in October of 2011 and resumed operations as “Quala”. Quala is a comprehensive bulk-container cleaning service for dry and liquid containers. The Saraland (Mobile County), Alabama location specializes in tank truck cleaning. The facility cleans tank trucks that have previously held hazardous products or wastes. The residual material in the empty tankers are containerized in 55-gallon drums and managed according to company guidelines. The material generated is managed through an on-site waste-water treatment system that discharges to the City of Saraland’s publicly owned treatment works (POTW) pursuant to State Indirect Discharge (SID) Permit #IU414900629. The facility runs two shifts and has 5 total employees.

In its most recent notification of regulated waste activity (ADEM Form 8700-12, received at the Department on January 22, 2015), QualaWash Holdings, LLC, identified itself as a large quantity generator of hazardous waste, a used oil generator, and a small quantity handler of universal waste.

## **Observations**

I arrived at the facility at approximately 10:50 a.m. and was greeted by Mr. Jackson. During the opening conference, I presented my identification and explained the purpose of the inspection.

Following the opening conference, Mr. Jackson provided the paperwork that I requested to review as part of the inspection. The following documents were reviewed:

- hazardous waste weekly inspection logs
- hazardous waste manifests
- contingency plan
- Job descriptions, Job titles, amount and type of training
- Waste minimization plan
- Hazardous waste report

All required paperwork appeared to be in order (i.e., accurate and complete), except for the weekly hazardous waste inspection logs. The time of inspection was missing for at least six of the hazardous waste weekly inspections.

After completing the paperwork review, we started the walkthrough portion of the inspection at the tanker cleaning area. The facility has two cleaning bays, where Quala employees remove the residual liquids from the tanker trailers. Quala personnel estimate that between 5 and 10 tankers are cleaned per day. The rinse water is captured in a sump system that directs the liquid to a holding basin where it is then pumped to the on-site waste-water treatment system. From the wastewater treatment system, the treated water is discharged to Saraland’s POTW under the facility’s SID permit.

The tank wash was not active during the inspection; therefore I was able to enter the area to inspect the sump system. The containment floor was free of any cracks or gaps. The sump system did not appear to



have any obstruction that would prevent the flow of liquids through the system. In the area there was a used oil storage drum. The drum was closed and labeled with the word "Used Oil". No issues were noted in this area.

The hazardous waste storage area is located on the south-east corner of the building. The area consists of a dividing wall that separates the hazardous waste storage area from the tank wash. The storage area was approximately 15 feet square. We entered the area from the south, where a chain-link fence with a gate acts as the barrier and main entrance; the gate was open when we arrived in the area. A warning sign "authorized personnel only" and a hazardous waste storage sign were legible and posted at the entrance. Once inside, I noticed that there was no fencing on the east or the north side of the area. Because of this absence, and the lack of a perimeter fence that encompasses the entire facility, Quala could not control access to the hazardous waste container storage area. The floor of the storage area was free of any cracks or gaps and bermed on all sides. There were no drums present in the area.

### Summary

Based on the observations made during the review of relevant documents and records and the walkthrough inspection of the facility, Quala appears to be as it described itself in its notification. The following non-complaint items were noted during the inspection:

1. Access control to the hazardous waste storage area is limited, due to the lack of fencing on two sides of the hazardous waste storage area.
2. The weekly hazardous waste inspection log was missing the time of inspection on about six inspections.

After completion of the records review, a closing meeting was held with Mr. Jackson to review the preliminary inspection results, and answer his questions. During the closing meeting, I prepared and then issued a *Noncompliance Warning* (ADEM Form 301), noting the noncompliant items listed above. Mr. Fletcher acknowledged receipt by signing the form. The "original" signed form was given to Mr. Fletcher for the facility's records and action. I departed the site at approximately 12:40 pm.

### Signed

Compliance and Enforcement Section, Industrial Hazardous Waste Branch  
Land Division

May 21, 2015

Date



**Concurrence**

A handwritten signature in black ink, reading "Clethes Stallworth", is positioned above a horizontal line.

Clethes Stallworth, Chief  
Compliance and Enforcement Section, Industrial Hazardous Waste Branch  
Land Division

**May 21, 2015**

Date